

**DECLARATION OF JAMES SAVAGE**

**PURSUANT TO 28 U.S.C. § 1746**

I, James Savage, declare as follows:

1. I reside in [Pegram, Tennessee] and am over the age of 18. I have personal knowledge of the facts in this declaration, and if called as a witness, I could and would testify to the facts stated herein.

2. In approximately [April 2022], I first came across Ecommerce Empire Builders (“EEB”) and Peter Pru (“Pru”) on Facebook. At the time I had just sold a property and got some extra money, and I wanted to invest in something else that wasn’t real estate. I started looking on social media for investment opportunities and then I started getting targeted advertisements for EEB and Pru. The advertisements I saw were for some sort of educational product, where EEB would help you start up and build a business. The educational part was supposed to teach you all the hoops you needed to jump through to get your business up and running.

3. I watched several of EEB and Pru’s videos before deciding to purchase their program. I remember Pru was very charismatic in his advertisements and pitch video. In the advertisements, Pru claimed that he had built three businesses online that were now making a lot of money. Pru claimed to sell businesses that would provide passive income or an online business “built for you,” and then showed the monthly income he was making from those same type of businesses. To me, it seemed like a viable side income. EEB would also use testimonials in their advertisements, showing other people who were successful using their businesses. After watching the advertisements and sales pitch video, I expected to make at least minimum \$1000 a week based on EEB’s promises.

4. After I watched their advertisements and pitch video, I set up more than one phone call with EEB representatives before purchasing the program. Someone called me and they continued to pitch me the businesses, they were like a salesman. They told me that I wouldn't have to do much and the business would only take me two hours of work a week. They said that my business would be successful if I just watched my business' metrics. It all seemed like a very simple lift. But ultimately it wasn't.

5. I paid \$25,000 to EEB for their premium program via wire transfer. They called it the inner circle or "Business In a Box" program. I paid for the business build and an educational part that also included access to a community of people.

6. Before I purchased EEB's program, I didn't receive any documents from EEB substantiating the earning or profit claims contained in their advertisements, or on their website. I also didn't receive any documents from EEB telling me whether the company had been subject to legal action, or a list of consumers who purchased EEB's services in the past three years. It would have been a major red flag to me if such documents had negated EEB's claims or that they were being sued.

7. After I purchased EEB's program, all they did was build a website and funnel for me and then that was then end of all interactions with the company. EEB claimed that they would build my business and get it up and running, but in reality, all they did was build the website and that was the extent of it. It was like "here you go, good luck." I didn't have the background knowledge or wherewithal needed to continue the business after they built it for me, so pretty much after the website and funnel were built the business just withered on the vine. Now I understand that the businesses would have needed a lot of time and knowledge to make it work. I had neither. In the end, the business was completely left for me to run on my own and it would

have become a full-time occupation to create and maintain profitability. To run the business EEB sold, I would have needed to be able to respond at a moment's notice.

8. After I purchased the program from EEB, they directed me to go through all of these education classes. The classes were supposed to teach me the nuts and bolts of the business, how to build it, how to run Facebook and Meta advertisements, and more. The education seemed almost immediately outdated though. I felt like something was wrong when I started watching the videos, because I thought this was all supposed to be a built for you business, not something that I needed to know to make the business work. It was all pretty dense stuff, people talking with a white board, etc. I felt troubled because I paid for a business in a box, not to go to ecommerce college.

9. As part of the program, you would choose a product niche and then dropship products related to that niche. I choose outdoor survival/prepper stuff. I was selling emergency whistles and USB fans for tents. EEB's process was to create a funnel for one product, then that should lead to other products, and then if you could get a consumer into a subscription then that's when you would start making real money from the store. However, the price points EEB set up on my website were just ridiculous. I easily found the same products for cheaper on Amazon. EEB would have me look on AliExpress, which is the Chinese version of Amazon, for cheap products in bulk, and then set it up so the customers' order would be dropshipped. But this dropshipping method would also end up with really weird delivery times that ultimately take a while. My stores never received even one order. In fact, I placed a test order and the product was never delivered to me. My stores completely failed after paying \$25,000 to EEB.

10. I believe that the stores EEB built for me were unprofitable in large part because the products EEB chose were readily available on other popular ecommerce stores for substantially less.

11. EEB ultimately built something for me, it was a website and a sales funnel, but it was not what I was expecting. It was nothing close to a passive income system that EEB and Pru sold to me. EEB made me believe that I could make at least \$1,000 a week with their ecommerce business, and I would have been fine with even \$750 a week. According to EEB and Pru, \$1000/week was supposed to be the worst case scenario. EEB and Pru claimed this was a business in a box, “let us do everything for you,” “we’re the experts,” and “we’ll show you results.” On the surface EEB and Pru seemed to be advertising modest profits that could become significant profits over time with little effort. But after they made the website then it was all 100% on me.

12. I never pursued a refund or chargeback with EEB, because it was my understanding that I couldn’t even initiate a refund with the company after I purchased. I thought it was kind of a buyer beware sort of scenario.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 8, 2024, in [*Pegram*, Tennessee.]

A handwritten signature in cursive script that reads "James Savage". The signature is written in black ink and is positioned above a horizontal line.

James Savage